

EXIDE BATTERY SITE

Westgate Trailer Park

- 4/9/96 - Exide signs consent agreement with SC DHEC for additional soil investigation of Westgate following the EPA removal in 1994
- 10/10/96 - SC DHEC approves Work Plan for soil investigation of Westgate
- 1/31/97 - Exide submits RI Report for Westgate
- 3/28/97 - SC DHEC comments on RI Report, comments are addressed
- 4/16/97 - SC DHEC comments to Exide regarding Remediation Plans for the entire site.
Specifically, Exide is told 2000 ppm is not acceptable and they should assume a minimum of 700 ppm until the final clean-up number for the state is generated.
- 5/22/97 - SC DHEC informs that remediation at Westgate will be necessary based on the RI Report and additional sampling by the Department. Exide is informed that a Remediation Plan specific to Westgate should be submitted and that the clean-up goal should be 400 ppm based on EPA recommendation.
- 6/10/97 - Exide responds back to SC DHEC questioning the 400 ppm action level. Several more letters are written thru July 1997 continuing to question the action level.
- 7/16/97 - SC DHEC receives the Remediation Plan for Westgate
- 8/13/97 - SC DHEC sends out comments on the Remediation Plan, specifically pointing out the clean-up level problem. The report proposed 2000 ppm, we insist on 400 ppm. Exide responds with similar letters questioning the basis for the 400 ppm level.
- 2/3/98 - SC DHEC received correspondence from EPA that 400 ppm is the level they would use if implementing the clean-up.
- 4/14/98 - SC DHEC contacts Exide requesting implementation of a soil removal to 400 ppm. EPA guidance on the 400 ppm level based on IEUBK modeling is included.
- 4/30/98 - Exide responds to letter, again questioning the 400 ppm level and requests a meeting which takes place on June 1, 1998. In the meeting, the Department agrees to allow Exide to conduct their own modeling, but continues to insist on 400 ppm.
- 7/28/98 - Following the drawn out submission of site specific data, a modeling report is submitted which concludes 520 ppm is an appropriate remediation goal.



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8/13/98 - Following a review of the modeling report, EPA is contacted and forwarded a copy of the report. Both parties agree that the report contains too many unsupported variables to concur with the 520 ppm number and that 400 ppm is still the appropriate goal.

8/31/98 - SC DHEC contacts Exide and explains the questions on the modeling. Based on the modeling review an additional request for a remediation plan to a 400 ppm level for lead is made at that time.

9/25/98 - Exide contacts the Department and requests a three party meeting with EPA prior to making a decision on the Westgate remediation. Subsequent attempts to schedule this meeting fail over the next several weeks.

10/30/98 - SC DHEC is copied on a letter from Exide to the EPA legal office questioning the legal support for the 400 ppm remediation level.